

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT
OF WEST VIRGINIA

* * * * *

SCOTT T. BALLOCK,

*

Plaintiff

* Case No.

vs.

* 1:17-CV-52

ELLEN RUTH COSTLOW,

*

STATE TROOPER MICHAEL

*

KIEF, STATE TROOPER

*

RONNIE M. GASKINS,

*

STATE TROOPER CHRIS

*

BERRY,

*

Defendants

*

* * * * *

DEPOSITION OF
MICHAEL KIEF
May 28, 2019

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EXHIBIT 3

1 know that, sir.

2 Q. Would information of that kind ordinarily be
3 noteworthy, essentially, to be written down in the course
4 of a criminal investigation?

5 A. I don't know if --- what kind of credence we
6 gave it at the time. I don't --- I don't know that.

7 Q. You didn't find it credible?

8 A. I don't --- I can't remember what context it
9 was given, so I really can't answer your question about
10 that.

11 Q. Have you ever read the report written by Dr.
12 Christi Cooper-Lehki?

13 A. No, sir.

14 Q. You sound pretty confident.

15 A. Oh, yeah.

16 Q. Were you interested to read it?

17 A. No, sir.

18 Q. Did it occur to you that it might shed relevant
19 evidence on the investigation that carried on for close
20 on three years against my client?

21 A. No, sir.

22 Q. Have you ever talked with the forensic
23 psychiatrist, Dr. Christi Cooper-Lehki?

24 A. No, sir.